

**EXHIBIT NO. \_\_\_(MBM-17)  
DOCKETS UE-151871/UG-151872  
PSE EQUIPMENT LEASING SERVICE  
WITNESS: MALCOLM B. MCCULLOCH**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Dockets UE-151871  
UG-151872**

**TENTH EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED REBUTTAL TESTIMONY OF  
MALCOLM B. MCCULLOCH  
ON BEHALF OF PUGET SOUND ENERGY**

**JULY 1, 2016**

**PSE Data Request No. 055 to SMACNA-WW:**

Regarding John van den Heuvel's testimony that "I do not believe that there is a need for a leasing service," is Mr. van den Heuvel aware of any water heating or HVAC equipment leasing programs offered in Western Washington? If so, for each such lease program offered please provide (1) the name of the entity offering the lease services; (2) the equipment leased; and (3) how long the lease service has been in place. Provide all documents in Mr. van den Heuvel's possession relating to the identified lease services or any other HVAC equipment or water heating lease services.

(Refer to page 8 of the Prefiled Direct Testimony of John van den Heuvel)

**Response:**

SMACNA-WW objects to this request to the extent it asks, or could be interpreted to ask, for information not in the possession, custody, or control of SMACNA-WW. SMACNA-WW does not possess this information. GENSCO, Inc. is a Washington corporation, and is not a party to this proceeding. To the extent this data request intends to seek to request information from John van den Heuvel, a witness offered by SMACNA-WW, Mr. van den Heuvel is a witness and also not a party to this proceeding. To the extent Mr. van den Heuvel's testimony is or could be interpreted to provide expert opinion testimony, PSE's data request to SMACNA-WW is nevertheless beyond the scope of permissible expert discovery under CR 26(b)(5).

Notwithstanding those objections, and without waiving them, Mr. van den Heuvel states:

I am unaware of any HVAC equipment leasing programs offered in Western Washington, so I believe that there isn't any. As GENSCO is a significant supplier to nearly all HVAC contractors in our trading area, and in Western Washington, we would likely have been approached to quote specific families and SKU's of HVAC gear (gas furnaces, air conditioners, heat pumps, air handlers, ductless heat pumps and a wide variety of "system enhancement"), that go along with satisfying the consumers HVAC needs today in this market.

In the 37 years I have been at GENSCO, we have only received this type of request from Washington Natural Gas and most recently PSE.

Witnesses knowledgeable about, and who can respond to, questions concerning this response:  
Julie Muller-Neff and John van den Heuvel.

Prepared by: Jeffrey D. Goltz, 360-528-3026  
Dated: June 21, 2016